

Bonnie MacNaughton (Bar No. 107402)  
Emily Goodell (admitted *pro hac vice*)  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Telephone: (206) 622-3150  
Facsimile: (206) 757-7700  
Email: [bonniemacnaughton@dwt.com](mailto:bonniemacnaughton@dwt.com)  
[emilygoodell@dwt.com](mailto:emilygoodell@dwt.com)

John D. Freed (Bar No. 261518)  
Jean M. Fundakowski (Bar No. 328796)  
**DAVIS WRIGHT TREMAINE LLP**  
50 California Street, Floor 23  
San Francisco, CA 94111  
Telephone: (415) 276-6500  
Facsimile: (415) 276-6599  
Email: jakefreed@dwt.com  
jeanfundakowski@dwt.com

Attorneys for Plaintiffs  
AMAZON.COM, INC. and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMAZON.COM, INC., a Delaware corporation, and AMAZON TECHNOLOGIES, INC., a Nevada corporation,

**Plaintiffs,**

V.

UMER WASIM, *et al.*,

### Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF EMILY GOODELL  
IN SUPPORT OF PLAINTIFFS  
AMAZON.COM. INC. & AMAZON  
TECHNOLOGIES, INC.'S REQUEST  
FOR ENTRY OF DEFAULT BY CLERK  
PURSUANT TO FED. R. CIV. P. 55(A) AS  
TO DEFENDANTS:**

(1) MUHAMMAD USMAN KHAN;  
(2) YASIR AGAR;  
(3) MUHAMMAD SHIRAZ QURESHI;  
AND  
(4) MAVIA NIZAM

1 I, EMILY GOODELL, declare under penalty of perjury under laws of the State of  
 2 California that the foregoing is true and correct.

3 1. I am over the age of eighteen and am competent to testify as to the matters set forth  
 4 herein. I have personal knowledge of the facts in this declaration, and base this declaration on my  
 5 personal knowledge.

6 2. I am an attorney for the law firm Davis Wright Tremaine LLP (“DWT”), which  
 7 represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (collectively, “Amazon”),  
 8 in this matter.

9 3. I make this Declaration in support of Amazon’s Request for Entry of Default  
 10 Pursuant to Fed. R. Civ. P. 55(a) as to Defendants: (1) Muhammad Usman Khan; (2) Yasir Agar;  
 11 (3) Muhammad Shiraz Qureshi; and (4) Mavia Nizam.

12 4. Amazon filed its Complaint in this Action on October 30, 2023. (ECF No. 1).

13 **Muhammad Usman Khan**

14 5. On November 8, 2023, the Court issued a summons to Defendant Muhammad  
 15 Usman Khan at the address 1221 W. 3rd Street, Apt. 502, Los Angeles, CA. (ECF. No. 12).

16 6. As Amazon previously explained in its Supplemental Declaration in Support of  
 17 Amazon’s Motion for Alternative Service, that Los Angeles address was provided to the Court in  
 18 the summons in error. The 1221 W. 3rd Street address is the address Amazon obtained for  
 19 Muhammad Zubair Khan, a different Defendant in this case with a similar name. (ECF. No. 56, ¶  
 20 7). Amazon never attempted to serve Muhammad Usman Khan at this address. (*Id.*).

21 7. Amazon obtained what it believed to be a residential address for Mr. Usman Khan  
 22 from the publicly filed Articles of Incorporation for co-Defendant VTLOGODESIGN Inc.: 13116  
 23 Peach Leaf Place, Fairfax, VA 22030. (ECF No. 16-1, Ex. A at 2). The same address for Mr.  
 24 Khan was listed on the Articles of Incorporation for co-Defendant MK Affiliates Inc.; Mr. Khan  
 25 incorporated both MK Affiliates Inc. and VTLOGODESIGN Inc. (*Id.* at 4).

26 8. Amazon directed personal service of the Complaint on Mr. Khan at 13116 Peach  
 27 Leaf Place, Fairfax, VA 22030. (ECF No. 56, ¶ 9).

1       9. On November 15, 2023, I received a response from process server Mark Hagood  
 2 that on November 15, 2023, at 10:17 am, he spoke with a male, “Rahn” at 13116 Peach Leaf  
 3 Place, Fairfax, VA 22030 “who stated the individual we are seeking has not lived here for several  
 4 years. He stated he is [sic] lives in California.” (ECF No. 30).

5       10. After searching public records, Amazon was unable to identify any California  
 6 address or any other address linked to Mr. Khan.

7       11. Amazon attempted service of Defendants VTLOGODESIGN Inc., and MK  
 8 Affiliates Inc., which were incorporated by Mr. Khan and list Mr. Khan as the officer and/or  
 9 director, at the business addresses listed on their publicly available corporate records from the  
 10 Florida Secretary of State at 1317 Edgewater Drive #6151, Orlando, FL 32804; 1317 Edgewater  
 11 Drive #156, Orlando, FL 32804; and 250 Intl Pkwy 108, Lake Mary, FL 32746. (ECF No. 22;  
 12 21). Mr. Khan was not present at any of these locations. (*Id.*)

13       12. In a further effort to locate an address and effect service on Mr. Khan, I searched  
 14 prior court records, found, and reviewed a document filed in the United States District Court in  
 15 the Middle District of Florida, case 6:22-cv-00798-PGB-GJK, that indicates that “United States’  
 16 counsel at the Federal Trade Commission conferred with Defendant Muhammad Usman Khan by  
 17 phone and email.” (ECF No. 16-1, Ex. B). In that court filing, U.S. Department of Justice  
 18 Attorney Ellen Bowden McIntyre certified that the defendants, including Muhammad Usman  
 19 Khan, were being served by electronic mail and U.S. Mail on April 26, 2022, to email addresses  
 20 [mkkhan@voipterminator.com](mailto:mkkhan@voipterminator.com), and [usman@khans.pk](mailto:usman@khans.pk) and a physical address in Pakistan, House  
 21 Number 1301 Service Road D121, Islamabad, Pakistan. (*Id.*).

22       13. Amazon.com business records indicated that an account using the name  
 23 “vtlogodesign inc” [sic] and email address vtlogodesignincamz@gmail.com was registered on  
 24 July 25, 2022. Both addresses and payment methods on the account are listed with the names  
 25 “VTLOGODESIGN, INC,” and “Muhammad Usman Khan.” The addresses listed on the account  
 26 in the name “Muhammad Usman Khan” are 13116 Peach Leaf Place, Fairfax, VA 22030—the  
 27 addresses where Amazon had already tried and failed to execute service on Mr. Khan—and House  
 28 No. 465, Street 8, G10-1, Islamabad, Pakistan.

1       14. Amazon retained Alan H. Crowe & Associates (Crowe Foreign Services) to  
 2 attempt service on Mr. Khan, in this case located in Pakistan, through the Hague Service  
 3 Convention.

4       15. On November 28, 2023, Crowe Foreign Services submitted formal Hague Request  
 5 documents and service documents to the Central Authority for Pakistan to be served upon Mr.  
 6 Khan at the two addresses found in the court filing from the U.S. District Court for the Middle  
 7 District of Georgia and Amazon's business records associated with Muhammad Usman Khan:  
 8 House No. 465, Street 8, G10-1, Islamabad, Pakistan and House No. 1301 Service Road D121,  
 9 Islamabad, Pakistan.

10      16. The terms of the Hague Convention do not require signatory nations to provide  
 11 updates as to the status of service or an obligatory time frame by which service must be  
 12 completed.

13      17. Based on Crowe Foreign Service's experience, the time to complete service to  
 14 Pakistan-based defendants through the Hague Convention varies but averages approximately eight  
 15 months.

16      18. Based on Amazon's concerns that service in Pakistan would not be successful or  
 17 could take as long as eight months and the email address I found in the Middle District of Florida  
 18 Action, Amazon filed a Motion for the Court to Approve Alternative Service of Mr. Khan by  
 19 email pursuant to Civil L.R. 7-11 on December 4, 2024. (ECF No. 16).

20      19. After reviewing a supplemental declaration submitted by Amazon detailing the  
 21 efforts taken to serve Mr. Khan, the Court granted Amazon's Motion, approving service to Mr.  
 22 Khan by email on March 4, 2024. (ECF No. 51, 56, 57).

23      20. Pursuant to the Court's Order and L.R. 4-2, on March 8, 2024, I sent the following  
 24 documents via registered electronic mail to Mr. Khan at [usman@khans.pk](mailto:usman@khans.pk);  
 25 [mkhan@voipterminator.com](mailto:mkhan@voipterminator.com); [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com); and  
 26 [finance@mkaffiliatenetwork.com](mailto:finance@mkaffiliatenetwork.com): Notice of Litigation and Preservation Demand, February 15,  
 27 2024 Case Management and Scheduling Order (ECF No. 55), Civil Cover Sheet, Complaint, N.D.  
 28 Cal. E-Filing Instructions, Judge Trina L. Thompson's Standing Order for Civil Cases, N.D. Cal.

1 Joint Case Management Statement Instructions, N.D Cal. Zoom Appearance Instructions, October  
 2 13, 2023 Order Setting Initial Case Management Conference and ADR Deadlines (ECF No. 6),  
 3 Court-issued Summons (ECF No. 12), and Court's Order granting Amazon's Motion for  
 4 Alternative Service (ECF No. 57). *See Exhibit A.*

5 21. On March 8, 2024, I received a receipt indicating that the e-mail had been  
 6 delivered and opened for reading by the recipient at [usman@khans.pk](mailto:usman@khans.pk) and  
 7 [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com). *See Exhibit B and Exhibit C.*

8 22. On March 13, 2024, I filed a Declaration with the Court affirming that Mr. Khan  
 9 had received my March 8, 2024 service email containing the Complaint and other case  
 10 documents. (ECF No. 59, ¶¶ 4-6).

11 23. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Mr. Khan was required to serve a responsive  
 12 pleading by March 29, 2024. (ECF No. 59).

13 24. To date, however, Mr. Khan has not served any responsive pleading, requested  
 14 additional time to serve a responsive pleading, or otherwise appeared to defend himself against  
 15 Amazon's allegations in this action. There is no indication that Mr. Khan intends to participate in  
 16 this lawsuit.

17 **Yasir Agar**

18 25. Yasir Agar registered domains that hosted websites used to perpetrate the alleged  
 19 fraud. (ECF No. 1, Compl. ¶¶ 79, 82, 85, 87, 95, 103, 105, 119).

20 26. In an attempt to obtain an address to effect service on Mr. Agar, I reviewed an  
 21 Amended Complaint filed in relation to Uniform Domain Name Dispute Resolution Policy  
 22 ("UDRP") Decision FA2305002043019 brought by Amazon to takedown domains infringing on  
 23 its intellectual property, which lists the registrant for amazonprofinc.com and  
 24 amazonkindleproinc.com, websites which are part of the scheme alleged in the Complaint, as  
 25 "Yasir Agar," with a contact email address of [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com), physical address of "Main  
 26 Bahadurabad, Karachi, Sindh 74800 PK" and the registrant for amazonkindlebookpublishing.com  
 27 as "Yasir Agar" with a contact email address of [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com), and physical  
 28 address of "Zulekha palace, BMCHS, Karachi, Sindh 74800, PK."

1       27. I also reviewed an Amended Complaint filed in relation to UDRP Decision  
 2 FA2307002053542, which lists the registrant for amazonkdpublishers.com, one of the twenty-six  
 3 websites which the Complaint identifies as part of the alleged fraud, *see* Compl. ¶ 57, as “Yasir  
 4 Agar” with a contact email address of [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) and physical address of “Main  
 5 Bahadurabad, Karachi, Sindh 74800 PK,” and the registrant for amazonkindlebookpublishing.com  
 6 as “Yasir Agar,” with a contact email address of [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com) and a physical  
 7 address of “Zulekha palace, BMCHS, Karachi, Sindh 74800, PK.”

8       28. Based on this information, Amazon retained Crowe Foreign Services to confirm  
 9 the physical address for Mr. Agar.

10      29. On September 28, 2023, a representative from Crowe Foreign Services informed  
 11 me that a hired investigator was able to confirm the address provided for an individual with the  
 12 name Yasir Agar at Flat 402, 4th Floor, Zulekha Palace, Plot #15, BMCHS, Sharfabad, Karachi,  
 13 Pakistan. I submitted this address to the Court for the purposes of preparing the proposed  
 14 summons. (ECF. No. 11).

15      30. On October 31, 2023, on behalf of Amazon, I sent correspondence containing a  
 16 copy of the Complaint and a litigation hold notice via registered email to Mr. Agar at  
 17 [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com) and [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com). I received confirmation that the  
 18 email to yasir@smartstartupsolutions.com was delivered and a second confirmation that the email  
 19 sent to the [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) was delivered and opened. (ECF No. 16-1, Ex. C). I have not  
 20 received a response from either of the two email accounts.

21      31. On November 8, 2023, the Court issued a summons to Yasir Agar at the address  
 22 Flat 402, 4th Floor, Zulekha Palace, Plot #15, BMCHS, Sharfabad, Karachi, PK 74800 (ECF No.  
 23 12).

24      32. On November 28, 2023, Crowe Foreign Services submitted formal Hague Request  
 25 documents and service documents to the Central Authority for Pakistan to be served upon Mr.  
 26 Agar at the Karachi address on the Court-issued summons.

1       33. The terms of the Hague Convention do not require signatory nations to provide  
 2 updates as to the status of service or an obligatory time frame by which service must be  
 3 completed.

4       34. Based on Crowe Foreign Services' experience, the time to complete service to  
 5 Pakistan-based defendants through the Hague Convention varies but averages approximately eight  
 6 months.

7       35. Amazon has not received any indication that Yasir Agar has been served in  
 8 Pakistan through the Hague Service Convention as of May 8, 2024.

9       36. Based on Amazon's concerns that service in Pakistan would not be successful or  
 10 could take as long as eight months and the email addresses I identified in the UDRP Decisions  
 11 cited above, Amazon filed a Motion for the Court to Approve Alternative Service of Mr. Agar by  
 12 email pursuant to Civil L.R. 7-11 on December 4, 2024. (ECF No. 16).

13       37. After reviewing a supplemental declaration submitted by Amazon detailing the  
 14 efforts taken to serve Mr. Agar, the Court granted Amazon's Motion, approving service to Mr.  
 15 Agar by email on March 4, 2024. (ECF No. 51, 56, 47).

16       38. Pursuant to the Court's Order and L.R. 4-2, on March 8, 2024, Amazon sent the  
 17 following documents via registered electronic mail to Defendant Yasir Agar at  
 18 [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) and [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com): Notice of Litigation and  
 19 Preservation Demand, February 15, 2024 Case Management and Scheduling Order (ECF No. 55),  
 20 Civil Cover Sheet, Complaint, N.D. Cal. E-Filing Instructions, Judge Trina L. Thompson's  
 21 Standing Order for Civil Cases, N.D. Cal. Joint Case Management Statement Instructions, N.D  
 22 Cal. Zoom Appearance Instructions, October 13, 2023 Order Setting Initial Case Management  
 23 Conference and ADR Deadlines (ECF No. 6), Court-issued Summons (ECF No. 12), and Court's  
 24 Order granting Amazon's Motion for Alternative Service (ECF No. 57). *See Exhibit D.*

25       39. On March 8, 2024, I received a receipt indicating that the email had been delivered  
 26 and opened for reading by the recipient at [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) and delivered to the recipient at  
 27 [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com). *See Exhibit E.*

40. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Mr. Agar was required to serve a responsive pleading by March 29, 2024. (ECF No. 59).

41. To date, however, Mr. Agar has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend himself against Amazon's allegations in this action. There is no indication that he intends to participate in this lawsuit.

## **Muhammad Shiraz Qureshi**

42. Like Mr. Khan, Defendant Muhammad Shiraz Qureshi registered domains that hosted websites used to perpetrate the alleged fraud. (ECF No. 1, Compl. ¶¶ 79, 82, 85, 87, 95, 103, 105, 119).

43. In an attempt to obtain an address to effect service on Mr. Qureshi, Amazon reviewed its business records, which indicate that an account using the name “Muhammad Shiraz qureshi” [sic] and email address [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com) was registered on August 28, 2018. A mailing address added to the account with the name “M Shiraz Qureshi” is n-121 Pechs Block 2, Karachi, Sindh, PK.

44. On September 20, 2023, Amazon's outside counsel provided me an email they received from [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com), on September 20, 2023, in relation to UDRP FA2307002053542. The email indicated it had been sent by Mr. Qureshi. (ECF No. 16-1, Ex. H).

45. Based on this information, Amazon retained Crowe Foreign Services to confirm the physical address for Mr. Qureshi. On September 28, 2023, a representative from Crowe Foreign Services informed Amazon that a hired investigator was able to confirm the address provided for an individual with the name Muhammad Shiraz Qureshi at n-121 Pechs Block 2, Karachi, PK.

46. On October 31, 2023, I sent a Copy of the Complaint and Litigation Notice as correspondence via registered email to Mr. Qureshi at [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com). I received confirmation that both emails were delivered and opened. (¶ 27, Ex. F).

1       47. On November 8, 2023, the Court issued a summons to Mr. Qureshi at the address  
2 found in Amazon's business records: N-121 PECHS, Block 2, Karachi, PK 74400. (ECF No. 12).

3       48. On November 28, 2023, on Amazon's behalf Crowe Foreign Services submitted  
4 formal Hague Request documents and service documents to the Central Authority for Pakistan to  
5 be served upon Mr. Qureshi at the Karachi address on the Court-issued summons.

6       49. The terms of the Hague Convention do not require signatory nations to provide  
7 updates as to the status of service or an obligatory time frame by which service must be  
8 completed.

9       50. Based on Crowe Foreign Services' experience, the time to complete service to  
10 Pakistan-based defendants through the Hague Convention varies, but averages approximately  
11 eight months.

12       51. Based on Amazon's concerns that service in Pakistan would not be successful or  
13 could take as long as eight months and the email addresses I identified in the UDRP Decision and  
14 Amazon's business records cited above, on December 4, 2023, Amazon filed a Motion for the  
15 Court to Approve Alternative Service of Mr. Qureshi by email pursuant to Civil L.R. 7-11. (ECF  
16 No. 16).

17       52. On February 20, 2024, I received a call from an individual who identified himself  
18 as Mr. Qureshi. Mr. Qureshi confirmed that he had received the email that I sent to him on  
19 October 31, 2023 containing the Complaint but did not respond, and added that he received a  
20 notification on his doorstep in Pakistan three days ago. I believe this notification was an attempt  
21 to complete personal service through the Hague Convention, though I had not received any  
22 notification indicating the service was completed. I responded that I would send a follow-up  
23 email after our call, and Mr. Qureshi requested that I send the email to the email addresses I had  
24 previously used, [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com).

25       53. On February 26, 2024, I received another phone call from the individual who  
26 identified himself as Mr. Qureshi, as well as a response to an email I sent to  
27 [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com) on February 20, 2024, following  
28 our phone call.

1       54. As of May 8, 2024, Amazon has not received a proof of service confirming that  
2 Mr. Qureshi was served through the Hague Service Convention, but believes the notification that  
3 was described in the phone call from Mr. Qureshi pertains to the Hague Service documents.

4       55. After reviewing a supplemental declaration submitted by Amazon detailing the  
5 efforts taken to serve Mr. Qureshi, the Court granted Amazon's Motion for Alternative Service,  
6 approving service to Mr. Qureshi by email on March 4, 2024. (ECF No. 51, 56, 47).

7       56. Pursuant to the Court's Order and L.R. 4-2, on March 8, 2024, Amazon sent the  
8 following documents via registered electronic mail to Mr. Qureshi at  
9 [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com): Notice of Litigation and  
10 Preservation Demand, February 15, 2024 Case Management and Scheduling Order (ECF No. 55),  
11 Civil Cover Sheet, Complaint, N.D. Cal. E-Filing Instructions, Judge Trina L. Thompson's  
12 Standing Order for Civil Cases, N.D. Cal. Joint Case Management Statement Instructions, N.D  
13 Cal. Zoom Appearance Instructions, October 13, 2023 Order Setting Initial Case Management  
14 Conference and ADR Deadlines (ECF No. 6), Court-issued Summons (ECF No. 12), and Court's  
15 Order granting Amazon's Motion for Alternative Service (ECF No. 57). *See Exhibit F.* Mr.  
16 Qureshi responded to the email to [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com) confirming he had received the  
17 service e-email. *Id.*

18       57. On March 8, 2024, I also received a receipt indicating that my service-mail email  
19 had been delivered and opened for reading by the recipient at [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com). *See*  
20 **Exhibit G.**

21       58. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Mr. Qureshi was required to serve a  
22 responsive pleading by March 29, 2024. (ECF No. 59).

23       59. On May 10, 2024, I received an email from attorney Brenda A. Prackup, indicating  
24 that she had been retained by Mr. Qureshi. We scheduled a call for May 10, 2024. To date,  
25 however, Mr. Qureshi has not served any responsive pleading or requested additional time to  
26 serve a responsive pleading.

**Mavia Nizam**

60. Like Mr. Qureshi and Mr. Agar, Mavia Nizam registered domains that hosted websites used to perpetrate the alleged fraud. (ECF No. 1, Compl. ¶¶ 95, 103, 105).

61. In an attempt to obtain address for Ms. Nizam, Amazon reviewed an Amended Complaint filed in relation to UDRP Decision FA2305002043019, which lists the registrant for amazondigitalpro.com as “mavia nizam” [sic] and amazonpublisherpro.com as “Ali Alam,” both with a contact email address of [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com). Both these domains are connected to the alleged fraud in the Complaint. (¶ 57). The contact address for “mavia nizam” [sic] in the Decision was “1/22 Shah Faisal Colony Karachi, Karachi, Sindh 75700, PK.”

62. Amazon also reviewed an Amended Complaint filed in relation to UDRP Decision FA2307002053540, which lists the registrant for amazonpublishingzone.com, another website tied to the alleged fraud in the Complaint, *see* ECF No. 1 at ¶ 57, as “Pennielynn stiansen” [sic] with a contact email address of [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com).

63. Amazon also obtained a copy of an email from [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com), dated September 19, 2023, in relation to UDRP FA2305002043019, indicating that it was written by Defendant Ali Alam. (ECF No. 16-1, Ex G). The email states that Ms. Nizam is Mr. Alam's employee and that both individuals used the same email address to register domains. (*Id.*).

64. On October 31, 2023, I sent correspondence via registered email to Ms. Nizam at [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com). (ECF No. 16-1, Ex. E). I received confirmation that the email was delivered and opened. (*Id.*). I have not received a response to this outreach from this email address.

65. Amazon retained Crowe Foreign Services to confirm the physical address for Ms. Nizam.

66. On November 3, 2023, a representative from Crowe Foreign Services informed Amazon that a hired investigator was unable to locate the address provided for Ms. Nizam at 1/22 Shah Faisal Colony, Karachi, Sindh, 75700, PK.

67. Amazon was unable to find any other address or contact information for Ms. Nizam other than the email address [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com).

1       68. On November 8, 2023, the Court issued a summons to Mavia Nizam at the address  
2 from the UDRP decision: 1/22 Shah Faisal Colony, Karachi, PK 75700. (ECF No. 12).

3       69. Based on Amazon's concerns that service in Pakistan would not be successful  
4 because the investigator could not locate the only known physical address for Ms. Nizam, on  
5 December 4, 2023, Amazon filed a Motion for the Court to Approve Alternative Service of Ms.  
6 Nizam by email pursuant to Civil L.R. 7-11. (ECF No. 16).

7       70. After reviewing a supplemental declaration submitted by Amazon detailing the  
8 efforts taken to serve Ms. Nizam, the Court granted Amazon's Motion, approving service to Ms.  
9 Nizam by email on March 4, 2024. (ECF No. 51, 56, 47).

10      71. Pursuant to the Court's Order and L.R. 4-2, on March 8, 2024, Amazon sent the  
11 following documents via registered electronic mail to Ms. Nizam at [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com):  
12 Notice of Litigation and Preservation Demand, February 15, 2024 Case Management and  
13 Scheduling Order (ECF No. 55), Civil Cover Sheet, Complaint, N.D. Cal. E-Filing Instructions,  
14 Judge Trina L. Thompson's Standing Order for Civil Cases, N.D. Cal. Joint Case Management  
15 Statement Instructions, N.D Cal. Zoom Appearance Instructions, October 13, 2023 Order Setting  
16 Initial Case Management Conference and ADR Deadlines (ECF No. 6), Court-issued Summons  
17 (ECF No. 12), and Court's Order granting Amazon's Motion for Alternative Service (ECF No.  
18 57). *See Exhibit H.*

19      72. On March 8, 2024, I received a receipt indicating that the message had been  
20 delivered to the mail server of [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com). *See Exhibit I.*

21      73. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Ms. Nizam was required to serve a  
22 responsive pleading by March 29, 2024. (ECF No. 59).

23      74. To date, however, Ms. Nizam has not served any responsive pleading, requested  
24 additional time to serve a responsive pleading, or otherwise appeared to defend herself against  
25 Amazon's allegations in this action. There is no indication that she intends to participate in this  
26 lawsuit.

1       75. Attached hereto as **Exhibit A** is a true and correct copy of the March 8, 2024,  
2 registered electronic service email to Mr. Khan at [usman@khans.pk](mailto:usman@khans.pk), [mkhan@voiptermintor.com](mailto:mkhan@voiptermintor.com),  
3 [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com); and [finance@mkaffiliatenetwork.com](mailto:finance@mkaffiliatenetwork.com).

4       76. Attached here to as **Exhibit B** is a true and correct copy of the Receipt indicating  
5 that the March 8, 2024, registered electronic mail had been delivered and opened for reading by  
6 the recipient at [usman@khans.pk](mailto:usman@khans.pk).

7       77. Attached here to as **Exhibit C** is a true and correct copy of the Receipt indicating  
8 that the March 8, 2024, registered electronic mail had been delivered and opened for reading by  
9 the recipient at [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com).

10      78. Attached hereto as **Exhibit D** is a true and correct copy of March 8, 2024  
11 registered electronic service email to Mr. Agar at [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) and  
12 [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com).

13      79. Attached here to as **Exhibit E** is a true and correct copy of the Receipt indicating  
14 that the March 8, 2024 registered electronic mail had been delivered and opened for reading by  
15 the recipient at [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) and delivered to the recipient at  
16 [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com).

17      80. Attached hereto as **Exhibit F** is a true and correct copy of March 8, 2024  
18 registered electronic service email to Mr. Qureshi at [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and  
19 [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com), including Mr. Qureshi's response.

20      81. Attached here to as **Exhibit G** is a true and correct copy of the Receipt indicating  
21 that the March 8, 2024 registered electronic mail was received by the recipient at  
22 [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com).

23      82. Attached hereto as **Exhibit H** is a true and correct copy of March 8, 2024  
24 registered electronic service email to Ms. Nizam at [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com).

25      83. Attached here to as **Exhibit I** is a true and correct copy of the Receipt indicating  
26 that the March 8, 2024 registered electronic mail was received by the recipient at  
27 [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com).

I declare under penalty of perjury under laws of the State of California that the foregoing is true and correct. Executed this 10<sup>th</sup> day of May, 2024, in Seattle, Washington.

*/s/ Emily Goodell*  
Emily Goodell (*pro hac vice*)

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